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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, *ex rel.*,  
Joshua Luke,

Plaintiff,

v.

HEALTHSOUTH CORPORATION,  
HEALTHSOUTH OF HENDERSON, INC. and  
KENNETH BOWMAN,

Defendants.

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*Attorneys for Defendants HealthSouth Corp.  
And HealthSouth of Henderson, Inc.*

Case No.: 2:13-cv-01319-APG-VCF

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINES SET  
FORTH IN SPECIAL MASTER'S ORDER  
RE: PLAINTIFF'S MOTION TO COMPEL  
AND JOINT PROPOSED REVISED  
SCHEDULING ORDER (DOC. 213)**

[DISCOVERY ISSUES ASSIGNED TO  
SPECIAL MASTER DAVID M. TENNER]

1 Plaintiff-Relator Joshua Luke ("Plaintiff"), as relator in this action, Defendants HealthSouth  
2 Corporation ("HealthSouth") and HealthSouth of Henderson, Inc. ("HealthSouth Henderson")  
3 (collectively, "HealthSouth Defendants"), and Defendant Kenneth Bowman ("Bowman") by and  
4 through their undersigned counsel, state as follows:

5 1. Whereas, the Court appointed a Special Master to oversee the discovery process on  
6 April 17, 2019 (Dkt. # 185);

7 2. Whereas, the Court appointed David M. Tenner as Special Master pursuant to the  
8 Parties' Joint Stipulation Concerning the Appointment of a Special Master (Dkt. #198);

9 3. Whereas, the Special Master's Order re: Plaintiff's Motion to Compel and Joint  
10 Proposed Revised Scheduling Order ("Special Master's Order") (Dkt. #213) was issued in writing on  
11 July 19, 2019, and stated that the rulings therein "were made effective as of the date of the hearing,  
12 July 10, 2019";

13 4. Whereas, the Special Master's Order set forth various deadlines related to discovery,  
14 including: (i) all responsive documents shall be produced by August 20, 2019; (ii) Plaintiff shall be  
15 entitled to take the Rule 30(b)(6) deposition of Defendant HealthSouth on or before September 10,  
16 2019; and (iii) the Parties shall file a Stipulated Revised Scheduling Order or Status Report on or  
17 before September 10, 2019;

18 5. Whereas, the HealthSouth Defendants filed their objections to the Special Master's  
19 Order on July 26, 2019 (Dkt. 216);

20 6. Whereas, the HealthSouth Defendants have communicated to Plaintiff that they are in  
21 the process of finalizing a production of documents that they plan to produce by August 14, 2019;

22 7. Whereas, the Parties are scheduled to hold a joint meeting with the United States  
23 Department of Justice ("DOJ") on August 13, 2019 to discuss this action;

24 8. Whereas, in light of the upcoming meeting with the DOJ, the Parties wish to extend the  
25 discovery deadlines set forth in the Special Master's Order.

26 Accordingly, the Parties to this stipulation hereby stipulate and agree to the entry of an order  
27 by the Special Master extending all deadlines set forth in the Special Master's Order by fourteen days,  
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with the exception that the production HealthSouth Defendants are currently in the process of finalizing will continue to be produced by August 14, 2019, unless Parties later stipulate otherwise.

The new deadlines related to discovery shall be as follows: (i) all responsive documents shall be produced by September 3, 2019; (ii) Plaintiff shall be entitled to take the Rule 30(b)(6) deposition of Defendant HealthSouth on or before September 24, 2019; and (iii) the Parties shall file a Stipulated Revised Scheduling Order or Status Report on or before September 24, 2019.

This stipulation is made in good faith, not interposed for delay, and not filed for an improper purpose.

DATED this 8th day of August, 2019.

**PISANELLI BICE, PLLC**

/s/ James Pisanelli

JAMES J. PISANELLI, ESQ.

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DATED this 8th day of August, 2019.

**THORNDAL, ARMSTRONG, DELK,  
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/s/ Philip Goodhart

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DATED this 8th day of August, 2019.

**REED SMITH LLP**

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DATED this 8th day of August, 2019.

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1 DATED this 8th day of August, 2019.

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11 /s/ Christopher D. Kircher

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14 *Attorneys for Defendant Kenneth Bowman*

DATED this 8th day of August, 2019.

**MORGAN VERKAMP LLC**

/s/ Frederick M. Morgan

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SONYA A. RAO

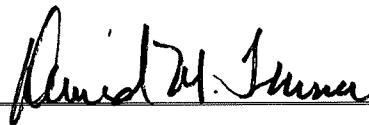
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15  
16 IT IS SO ORDERED:

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18 \_\_\_\_\_

19 SPECIAL MASTER DAVID M. TENNER

20  
21 DATED: 8/9/19

22 CASE NO.: 2:13-cv-01319-APG-VCF  
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